

UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY

Caption in Compliance with D.N.J. LBR 9004-1(b)

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In Re:

Massah S. Morris

Case No.: 17-34333

Judge: Kaplan

Chapter: 13

CHAPTER 13 DEBTOR'S CERTIFICATION IN OPPOSITION

The debtor in this case opposes the following (**choose one**):

1. ☐ Motion for Relief from the Automatic Stay filed by _____, creditor,

A hearing has been scheduled for _____, at _____.

- ☒ Motion to Dismiss filed by the Chapter 13 Trustee.

A hearing has been scheduled for March 11, 2020, at 9 am.

- ☐ Certification of Default filed by _____,

I am requesting a hearing be scheduled on this matter.

2. I oppose the above matter for the following reasons (**choose one**):

☐ Payments have been made in the amount of \$ _____, but have not been accounted for. Documentation in support is attached.

☐ Payments have not been made for the following reasons and debtor proposes repayment as follows (**explain your answer**):

☒ Other (**explain your answer**):
see attached.

3. This certification is being made in an effort to resolve the issues raised in the certification of default or motion.
4. I certify under penalty of perjury that the above is true.

Date: 3/4/2020

Messiah S. Harris
Debtor's Signature

Date: _____

Debtor's Signature

NOTES:

1. Under D.N.J. LBR 4001-1(b)(1), this form must be filed with the court and served on the Chapter 13 Trustee and creditor, if applicable not later than 7 days before the date of the hearing if filed in opposition to a Motion for Relief from the Automatic Stay or Chapter 13 Trustee's Motion to Dismiss.
2. Under D.N.J. 4001-1 (b)(2), this form must be filed with the court and served on the Chapter 13 Trustee and creditor, if applicable not later than 14 days after the filing of a Certification of Default.

Attachment to Debtor's Certification in Opposition to Trustee's Motion to Dismiss
Massah S. Morris
17-34333-MBK

After American Honda obtained relief from the automatic stay my attorney prepared a modified plan that I thought was filed with the Court. Upon receipt of the Trustee's Motion I signed the modified plan and my attorney will be filing it with the Court.

I have worked at Barney's in New York for 31 years and the Manhattan store is closing. I will be laid off sometime in the near future. I have been struggling to maintain my Trustee payments and I am uncertain as to my future employment. Although I may earn far less at a new job, I will also not be commuting to Manhattan from Willingboro daily.

I hope to make a good faith payment to the Trustee before the March 11, 2020 hearing and I would ask for an adjournment for at least two months so that I can find a new job and submit an amended budget to allow me to complete the Chapter 13 Plan.